



**MCI Telecommunications  
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EX PARTE OR LATE FILED

**Lisa B. Smith**  
Senior Policy Counsel  
Local Markets and Enforcement

**ORIGINAL**

April 28, 1999

**EX PARTE**

VIA HAND DELIVERY

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Room TWB-204  
Washington, D.C. 20554

**RECEIVED**  
**APR 28 1999**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

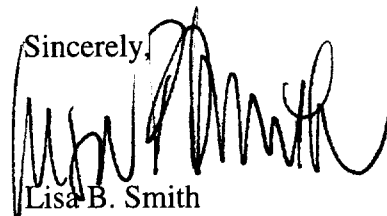
Re: Applications for Consent to the Transfer of Control of Licenses and Section 214  
Authorizations from Ameritech to SBC, CC Docket No. 98-141.

Dear Ms. Salas:

MCI WORLDCOM submits the enclosed letter regarding MCI WORLDCOM's proposed OSS-related conditions in the referenced matter. Please place this letter in the above-referenced FCC docket.

Pursuant to section 1.1206(b) of the Commission's Rules, MCI WorldCom submits two copies of this ex parte notice for inclusion in the public record of the above-referenced proceeding.

Sincerely,



Lisa B. Smith

cc: Robert Atkinson  
Thomas Krattenmaker  
Stagg Newman  
Michael Pryor  
Bill Dever  
Elizabeth Nightingale

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VIA HAND DELIVERY  
and FACSIMILE

Jake Jennings  
Federal Communications Commission  
Common Carrier Bureau  
Policy Division  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

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Re: Applications for Consent to the Transfer of Control of Licenses and Section 214  
Authorizations from Ameritech to SBC, CC Docket No. 98-141

Dear Mr. Jennings:

Pursuant to your request, MCI WORLDCOM, Inc. ("MCI WORLDCOM") submits this letter regarding proposed OSS-related "pre-conditions" for the Federal Communications Commission's ("Commission") consideration with respect to the proposed merger of SBC and Ameritech.

As an initial matter, MCI WORLDCOM maintains that SBC and Ameritech have failed to demonstrate that this merger serves the public interest. For this reason, we reiterate our position that the merger application must be rejected. Be that as it may, the Commission has specifically requested that parties propose conditions that would address concerns about any adverse impact that the proposed merger would have on local competition in the SBC and Ameritech regions. As a result of this request, MCI WORLDCOM submits these OSS-related pre-conditions.

It should be noted that MCI WORLDCOM believes that SBC and Ameritech should be subject to pre-conditions that must be implemented before SBC and Ameritech are permitted to consummate their proposed merger. Specifically, this means that if the Commission determines to approve the merger application, the parties would have to comply with pre-conditions before they are permitted to consummate the proposed merger. Furthermore, the Commission should establish a process to be completed before any closing to determine whether each "pre-condition" has been satisfied.

MCI WORLDCOM's Proposed OSS-Related Pre-Conditions

- **Operations Support Systems (OSS):** SBC and Ameritech must implement uniform Graphical User Interfaces ("GUT") and uniform application-to-application interfaces for all operations support systems ("OSS") functions (i.e., pre-ordering, ordering, provisioning, billing, and repair and maintenance) within the combined regions. These interfaces shall comply with the latest industry standards/guidelines developed under the auspices of the Alliance for Telecommunications Industry Solutions ("ATIS").

- (a) The following definitions shall apply:

*Uniform interface* - A uniform interface must use precisely the same business rules, data formatting specifications, and transport and security specifications across the entire SBC and Ameritech regions, thereby enabling a CLEC to use an interface developed and implemented in one SBC and/or Ameritech state in every other SBC and Ameritech state.

*Industry standard interface* - An interface based on the ATIS industry standards must comply with the industry standards or guidelines. It must accommodate every industry standard field and valid value and must use only industry standard fields and valid values, except that the interface may deviate from the standards where necessary to provide CLECs with nondiscriminatory access to the relevant OSS function.

*Interface Implementation* - An interface will be considered implemented only after it is proven by independent third-party testing and carrier-to-carrier testing to provide nondiscriminatory operational access to the relevant OSS function at commercial volumes of transactions, and to include a comprehensive and functioning change management process.

- (b) SBC and Ameritech must implement uniform Graphical User Interface ("GUT") and uniform application-to-application industry standard interfaces throughout the joint SBC/Ameritech region before they are permitted to consummate the proposed merger, but in any event no more than 12 months after Commission approval of the merger application.
- (c) In order to ensure development and implementation of the required interfaces in a timely and efficient manner, SBC and Ameritech must submit a plan for Commission approval as part of the merger proceeding that includes: (i) a statement of which industry standard versions or releases they propose to implement as uniform, (ii) a detailed development and implementation schedule,

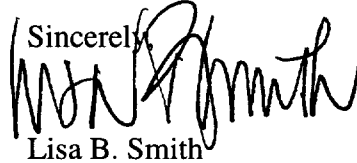
with specific dates for reaching key milestones and including meaningful opportunities for CLEC input, and (iii) a change management process that will ensure no disruption of OSS access for CLECs during development and implementation and through a reasonable transition period into production using the new interfaces. This plan must also be subject to expedited notice and comment. SBC agrees to post a performance bond of \$500 million to ensure that its interfaces are uniform throughout the joint SBC and Ameritech region within the requisite time frame. If SBC and Ameritech fails to implement industry standard interfaces on a uniform basis throughout its region or to meet any of the deadlines provided in this condition, SBC and Ameritech will forfeit the performance bond and merger approval will be vacated. The Commission must approve the plan as part of the merger approval process.

- (d) SBC and Ameritech must implement the latest industry standards no later than 90 days after ATIS approval.
- **Carrier-to-Carrier Testing:** SBC and Ameritech shall conduct carrier-to-carrier testing of its interfaces for obtaining access to OSS with carriers that request to engage in such testing. SBC and Ameritech shall agree to conduct such testing as soon as possible after a request from a carrier, and in any event, no later than 30 days after a request for such testing has been received. This carrier-to-carrier testing shall be conducted using commercial or noncommercial orders to ensure compatibility between the two carriers' systems. The participating carriers shall determine the appropriate time period for the duration of such a test. SBC and Ameritech shall not limit the opportunity for carrier-to-carrier testing for any individual carrier. SBC and Ameritech must provide complete and correct documentation of all systems before any such testing is scheduled and/or completed.
- **Third-Party Testing:** SBC and Ameritech shall conduct independent third-party testing of their OSS systems that it implements throughout all of its territory (including the former SWBT, PacBell, SNET and Ameritech regions). Testing must include the full spectrum of end-to-end OSS functions and processes: pre-order, ordering, provisioning, repair, maintenance and billing. The independent third-party should be selected by state commissions with input from interested CLECs and SBC and Ameritech. The independent third-party shall develop a detailed and comprehensive test plan, with input from CLECs, so that testing approximates real world conditions and includes the full spectrum of functions and processes, and ensures compliance with the terms set forth in these pre-conditions. CLECs must also be given the opportunity to comment on the implementation of the test plan as well as on the test results. CLECs should have access to all meetings, documentation, and communications shared between SBC, Ameritech and the third-party tester. Testing should culminate in a report to the Commission,

Jake Jennings  
April 28, 1999  
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interested state commissions, and interested CLECs. SBC and Ameritech shall bear the costs of third-party testing.

Please feel free to contact me if you have questions or need further clarification on these pre-conditions.

Sincerely,  
  
Lisa B. Smith

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